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August 22, 2016

VIA ECF

Hon. Barbara Moses
United States District Court
Southern District of New York
New York, New York 10007

Re: *Joint Stock Company “Channel One Russia Worldwide,” et al. v. Infomir, LLC et al.* 16-cv-01318 (GBD) (BCM)

Dear Judge Moses:

We represent Plaintiff Broadcasters in the above-captioned matter. We submit this joint letter with counsel for Defendants Matvil Corp. d/b/a eTVnet (“Matvil Canada”), Matvil Corp. (“Matvil New York”) and Mikhail Gayster (collectively “Matvil”) pursuant to Rule II(A) of the Court’s Individual Practices to request that Matvil’s time to respond to the Complaint be extended by one week to August 29, 2016.

1. Matvil’s response is currently due on August 22, 2016 pursuant to the Order granting Letter Motion entered on August 4, 2016. (ECF Doc. 98)
2. This is the third request for extension.¹
3. The second request was granted. However, the Order provides that “no further extensions will be granted.” (ECF Doc. 98)
4. This request is being submitted because counsel for Plaintiff Broadcasters and Matvil have made significant progress towards resolving the claims against Matvil and reaching a settlement in this case.
5. Since the parties made the second request to extend Matvil’s time to respond to the Complaint, on August 19, 2016, plaintiff, Open Joint Stock Company “ACCEPT” filed a Notice of Voluntary Dismissal to dismiss all claims against Matvil with prejudice. The Notice of Voluntary Dismissal is currently being reviewed by the Orders and Judgments Clerk. A copy is included with this letter.

¹ Through stipulation with the Plaintiffs, Matvil New York previously requested that its time to respond to the Complaint be extended to August 1, 2016 to be coordinated with the time for Matvil Canada and Mikhail Gayster to respond to the Complaint.

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6. There is only one remaining plaintiff that is asserting claims against Matvil, Joint Stock Company “Channel One Worldwide,” and last week the parties reached a settlement in principle that would fully resolve all claims being asserted against Matvil.
7. The parties have worked in good faith to finalize the terms of the settlement and are endeavoring to resolve the few remaining issues.
8. This request is jointly submitted on consent.

Counsel for all parties are in agreement that continued efforts towards resolution will be productive, whereas a potential motion or response by Matvil may unnecessarily burden both the Court and the parties with extraneous issues. Plaintiff Broadcasters and Matvil agree that the proposed response date of August 29, 2016 will provide for an appropriate amount of time for the parties to finalize a settlement agreement.

Therefore, Plaintiff Broadcasters and Matvil jointly respectfully request that the Court enter an Order extending Matvil’s time to respond to the Complaint to August 29, 2016.

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